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DOCKET 01-AFC-14
DATE NOV 30 2001
RECD. NOV 30 2001

November 30, 2001

CALIFORNIA ENERGY COMMISSION
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket No. 01-AFC-14

Dear Sir/Madame:

Enclosed for filing with the California Energy Commission are an original and 12 (twelve) copies of the attached **Applicant's Response to Staff Data Requests of November 20, 2001**.

Sincerely,



Allan J. Thompson
One of Counsel
Roseville Energy Facility, L.L.C.

AJT:dmg
Enclosures
Cc: Service List

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Robert A. Laurie
Commissioner and Presiding Member
Roseville Energy Facility

Lance Shaw
Siting Project Manager
Roseville Energy Facility

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Subject: Staff Data Requests of November 20, 2001

On November 20, 2001 the Staff issued Data Requests 1 – 104 in this proceeding. Pursuant to the provisions of Title 20 CCR 1716(f) the recipient of data requests has ten days to object to providing the information requested. This response by the recipient of the data requests "shall state the reasons for the inability or the grounds for the objection."

Applicant REF does not object to any of the 104 data requests issued on November 20, 2001, except that portion of request 67 discussed below. There are a number of requests that cannot be answered by the December 20, 2001 deadline for response (See 20 CCR 1716 (f)). The code requires that if the responding party is "unable to provide...the information (the responding party) shall state the reasons for the inability". Please note that the requests that cannot be answered at this time all involve studies or information that must be obtained from others. Additionally, studies that will be produced by Western Area Planning Administration and Pacific Gas & Electric Company will, by necessity, include other projects that are currently under CEC review. This complicates their task.

A. Objection.

Technical Area: Efficiency Data Request 67

The last sentence in Data Request 67 asks if the "applicant plan(s) to pay the cost of the reinforcement to the local transmission system." Applicant is unable and unwilling to provide this information because this commercial arrangement with PG&E

has not been finalized and Applicant fails to see the relevance of this commercial term to the review of Project Efficiency in particular, and the project as a whole.

B. December 20, 2001 Filing. Applicant may not be able to respond to the following data requests by the December 20, 2001 due date. REF reiterates that it will respond to these questions when the requested information becomes available.

1. PG&E Gas Study.

DR 1, 2, 3, 4, 69 and 70. These data requests seek information that can only be provided by PG&E. PG&E has agreed to perform a gas service study that will be released in December. REF will file this study, and any additional engineering and environmental information required by any of PG&E's findings as soon as practical. To the extent that the PG&E gas study requires supplementing or amending REF's response to data requests 1 and 4, REF will revise the December 20 responses as appropriate.

2. Western Area Power Administration. (Western)

DR 35, 38, 41, 67 and 81. Western is currently conducting a system impact study for the REF. We have been assured that the information requests in the staff data requests will be addressed in this study. REF will file the study, and all necessary engineering and environmental information required by the results of the study. Western has assured REF that the study will be complete in December 2001. Western has been extremely responsive in analyzing the impacts from REF to the Western grid and believe their responsiveness will continue to support Staff's review of the System Impact Study.

3. Placer County Air Pollution Control District.

DR 28 and 29. REF will file documentation that the ERC package has been approved when the Draft DOC is available for the Placer County Air Pollution Control District. REF anticipates that this document will be available by the end of February 2002

4. North Central Information Center (NCIC).

DR 53, 54 and 55. REF has contacted the NCIC, as directed by these data requests, to obtain the information sought by the CEC Staff. Although REF will make every attempt to obtain the information sought and supply it to the Staff on or before December 20, 2001, REF cannot guarantee that the NCIC will provide the information by that date.

5. Local Historical Societies.

DR 57, 58 and 59. REF has contacted local historical and archeological societies, as directed by these data requests, to obtain information sought by the CEC Staff. Although REF will make every attempt to obtain the information sought and

supply it to the Staff by December 20, 2001, REF cannot guarantee that these private groups will respond in a timely manner.

6. City of Roseville.

DR 86 and 87. REF will provide examples of the plants and trees that will likely be employed in the landscape plan adopted for the project. The selection and placement of the plants and trees will be incorporated into a Landscape Plan that will be submitted to the CEC Staff and the City of Roseville for comment. REF advocates the preparation of this Landscape Plan during project construction so that the plan can incorporate shielding the plant from housing and city road views that are now in the early planning stage. (See Condition of Certification VIS-5 in Three Mountain Power Plant Project, Final Decision, May 16, 2001, Page 338).

7. Visual Aerial Photography

DR 85. Applicant has made inquiries to aerial photography companies and has been assured that these aerial photographs can be provided to REF. However, in as much as the flights are weather dependant and the number of available airplanes has decreased since September 11, 2001, we are unsure whether data request can be answered by December 20, 2001.

Applicant will submit its responses to all other data requests on December 20, 2001, thirty days from the issuance and receipt of the data requests.

Respectfully Submitted:

November 30, 2001



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